STATE OF NEW HAMPSHIRE BEFORE THE NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

DW 02-126

Re: Pennichuck Water Works, Inc.
Pittsfield Aqueduct Company
Pennichuck East Utility, Inc.

PETITION FOR INTERVENTION BY CITY OF NASHUA

The City of Nashua ("City") hereby petitions to intervene in the above-captioned proceeding. In support of its petition, the City states as follows:

- The City is a municipal corporation in Hillsborough County with an address of City Hall, 229 Main Street, Nashua, New Hampshire 03061.
 - 2. Nashua has a population of 86,605 according to the 2000 U.S. Census.
- 3. The vast majority of businesses and residences in Nashua are supplied with domestic water by Pennichuck Water Works ("PWW").
- 4. The PWW water system in Nashua includes more than 2,000 hydrants for fire protection for which the City pays PWW an annual fee of approximately \$1.6 million per year.
- 5. The City itself is a major domestic water supply customer and ratepayer of PWW.
- 6. PWW owns approximately 600 acres of land with buildings, plant, and other improvements in Nashua with an assessed value of more than \$50 million and real estate tax liability of some \$885,000 for tax year 2001.

- 7. Land owned by PWW in and adjacent to Nashua includes reservoirs and associated watershed land whose proper stewardship and protection is important for the future quality and quantity of the water supply for Nashua and the region.
- 8. For the foregoing reasons, the rights, duties, privileges, immunities and other substantial interests of the City will be affected by this proceeding.
- 9. The interests of justice and orderly and prompt conduct of this proceeding will not be impaired by allowing the City's intervention.

WHEREFORE, the City of Nashua respectfully requests that pursuant to RSA 541-A:32 and PUC 203.02, the Commission grant it full intervenor status in this proceeding.

Respectfully submitted,

City of Nashua By its Attorney

Dated: 7-12-02

David R. Connell, Esq.

Corporation Counsel

229 Main Street, Box 2019

Nashua, NH 03061-2019

(603) 589-3250

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the foregoing Petition for Intervention by City of Nashua to be mailed, postage prepaid, to all parties on the attached service list as of July 12, 2002 on this 12th day of July, 2002.

David R. Connell, Esquire